

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

2023 JAN 19 PM 1:03

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NALAH T. JACKSON,

Defendant.

CASE NO. *23-04*

JUDGE *Watson*

INDICTMENT

18 U.S.C. § 1201(a)(1) & (g)

THE GRAND JURY CHARGES:

COUNT ONE  
(Kidnapping of a Minor)

1. Between on or about December 19, 2022, and December 20, 2022, in the Southern District of Ohio, the defendant, **NALAH T. JACKSON**, did willfully and unlawfully seize, confine, kidnap, abduct, and carry away John Doe #1, a minor victim who had not attained the age of 18 years old, and held John Doe #1 for ransom and reward and otherwise, and used any means, facility, and instrumentality of interstate commerce in committing and in furtherance of the offense, when **NALAH T. JACKSON** was over the age of 18 and was not John Doe #1's parent, grandparent, brother, sister, aunt, uncle, or an individual having legal custody of John Doe #1.

In violation of Title 18, United States Code, Section 1201(a)(1) & (g).

**COUNT TWO**  
**(Kidnapping of a Minor)**

2. Between on or about December 19, 2022, and December 22, 2022, in the Southern District of Ohio and elsewhere, the defendant, **NALAH T. JACKSON**, did willfully and unlawfully seize, confine, kidnap, abduct, and carry away John Doe #2, a minor victim who had not attained the age of 18 years old, and John Doe #2 was transported and caused to be transported in interstate commerce, and **NALAH T. JACKSON** used any means, facility, and instrumentality of interstate commerce in committing and in furtherance of the commission of the offense, and held John Doe #2 for ransom and reward and otherwise when **NALAH T. JACKSON** was over the age of 18 and was not John Doe #2's parent, grandparent, brother, sister, aunt, uncle, or an individual having legal custody of John Doe #2.

In violation of Title 18, United States Code, Section 1201(a)(1) & (g).

s/Foreperson  
Foreperson

**KENNETH L. PARKER**  
**UNITED STATES ATTORNEY**

  
\_\_\_\_\_  
**EMILY K. CZERNIEJEWSKI (IL 6308829)**  
**NOAH R. LITTON (OH 0090479)**  
Assistant United States Attorneys